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November 30, 2021

**VIA ECF**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

*Re: United States v. Ghislaine Maxwell, 20 Cr. 330 (AJN)*

Dear Judge Nathan,

I write following our conferral with the government about protecting the anonymity of certain testifying witnesses in this case. The government suggested to us that we must avoid any public mention of: (1) names of people, places, or specific addresses or locations; (2) particular dates of career events or life events; (3) names of any employers, particular performances, or characters played; (4) specific details of story arcs in any performances played; (5) references to publicly available information or publicly available records that contain a pseudonymous witness's real name; and (6) court filings or other court documents.

Respectfully, the government's proposal is overly broad and unworkable.

We are mindful of the Court's orders on this topic, and we have no objection to many of the government's suggestions—e.g., the names of people or specific addresses or particular employers. But the government's proposal reaches much too far, and it would unfairly constrain Ms. Maxwell's ability to meaningfully and effectively confront her accusers. U.S. Const. amend. VI.

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Not only that, but the government’s direct examination of Jane today would have violated its own proposal—for example, the government elicited testimony about where Jane attended school and during what years, a prime example of a “specific location” and “particular dates of life events” the government now seeks to prevent Ms. Maxwell from eliciting on cross-examination. The government’s proposal is also contrary to this Court’s earlier ruling permitting Ms. Maxwell to confront her accusers by eliciting evidence of their story lines.

We will remain cognizant of our duty to avoid revealing the names of witnesses testifying under pseudonyms. And we will alert the government and the court in advance as we are able to anticipate any issues.

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Respectfully submitted,



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cc: Counsel of record (via ECF)